

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ANALOG DEVICES, INC. and HITTITE
MICROWAVE LLC,

Plaintiffs,

v.

MACOM TECHNOLOGY SOLUTIONS
HOLDINGS, INC. and MACOM
TECHNOLOGY SOLUTIONS INC.,

Defendants.

Civil Action No.: 1:18-cv-11028-GAO

FILED UNDER SEAL

**DECLARATION OF KIMBERLY A. MOTTELEY IN SUPPORT OF
ANALOG'S MEMORANDUM OF LAW IN SUPPORT OF
ITS MOTION FOR PRELIMINARY INJUNCTION**

I, Kimberly A. Mottley, declare the following:

1. I am an attorney at Proskauer Rose LLP and counsel for Plaintiffs Analog Devices, Inc. and its wholly-owned subsidiary Hittite Microwave LLC (collectively, "Analog").
2. I submit this declaration in support of Analog's Memorandum of Law in support of its Motion for Preliminary Injunction (the "Motion").
3. Attached as Exhibit A is a true and correct copy of Frank Traut's Public Profile listed on LinkedIn.
4. Attached as Exhibit B is a true and correct copy of an executed copy of Hittite's Proprietary Information, Confidentiality and Inventions Agreement (dated March 2003).

5. Attached as Exhibit C is a true and correct copy of a March 13, 2015 Letter from Analog outside counsel Adam P. Forman to Frank Traut, attaching an executed copy of Analog's Employee Confidentiality and Developments Agreement (dated September 2014).

6. Attached as Exhibit D to the Motion is a true and correct copy of records reflecting file downloads, including exported files and files copied to a removable drive, by Mr. Traut immediately prior to his departure from Analog for MACOM (dated December 2014 and January 2015).

7. Attached as Exhibit E is a true and correct copy of a March 18, 2015 Letter from Analog's Senior Vice President, General Counsel and Secretary Margaret K. Seif to MACOM's President and CEO John Croteau.

8. Attached as Exhibit F is a true and correct copy of a September 21, 2016 MACOM Press Release announcing MACOM's release of its MAAP-011247 amplifier.

9. Attached as Exhibit G to the Motion is a true and correct copy of U.S. Patent No. 9,425,752 (the “752 Patent”).

10. Attached as Exhibit H is a true and correct copy of an office action (dated April 29, 2015) from the U.S. Patent and Trademark Office from the prosecution file history of the '752 Patent.

11. Attached as Exhibit I is a true and correct copy of an office action (dated September 9, 2015) from the U.S. Patent and Trademark Office from the prosecution file history of the '752 Patent.

12. Attached as Exhibit J is a true and correct copy of an office action (dated January 21, 2016) from the U.S. Patent and Trademark Office from the prosecution file history of the '752 Patent.

13. Attached as Exhibit K is a true and correct copy of a notice of allowability (dated April 15, 2016) from the U.S. Patent and Trademark Office from the prosecution file history of the '752 Patent.

I hereby declare under the penalties of perjury under the laws of the United States that the above statements are to the best of my knowledge true and correct.

Dated: June 29, 2018

By: */s/ Kimberly A. Mottley*

Kimberly A. Mottley

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on June 29, 2018.

/s/ Steven M. Bauer
Steven M. Bauer
